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*the southern electric system*

HL-32  
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September 8, 1988

U.S. Nuclear Regulatory Commission  
ATTN: Document Control Desk  
Washington, D.C. 20555

PLANT HATCH - UNITS 1, 2  
NRC DOCKETS 50-321, 50-366  
OPERATING LICENSES DPR-57, NPF-5  
REQUEST FOR ADDITIONAL INFORMATION  
GENERIC LETTER 83-28

Gentlemen:

On May 9, 1988, Georgia Power Company (GPC) received a request for additional information (RFAI) from the NRC, dated May 6, 1988, relative to GPC's response to Generic Letter (GL) 83-28. On July 19, 1988, GPC met with NRC representatives in Rockville, Maryland, to discuss the items contained in the RFAI.

The requested information was generally related to the development, maintenance, and use of the Equipment Location Index (ELI) and System Evaluation Documents (SEDs). Enclosure 1 delineates GPC's response to the RFAI. In previous correspondence with the NRC, the ELI was identified as the document which would be used to satisfy Section 2.1 of GL 83-28. Additionally, in previous correspondence, GPC stated that the ELI would be reviewed against the SEDs to assure accuracy and completeness, once the SEDs were completed. At the July 19 meeting, GPC informed the NRC that the SEDs would be completed by the end of 1989.

Subsequent to the July 19 meeting, GPC re-examined the necessity of maintaining the ELI and the SEDs as basic documentation for the listing of safety-related components. Based on the evaluation, GPC determined the SEDs fully satisfy all the requirements of GL 83-28, Section 2.1, therefore, presenting the information via the ELI is redundant. Accordingly, GPC wishes to inform the NRC that the SEDs, rather than the previously indicated ELI, will be used to satisfy the requirements of Section 2.1 of GL 83-28. A sample SED is included in Enclosure 2.

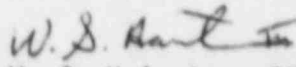
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If you have questions in this regard, please contact Mr. L. T. Gucwa  
at (404) 526-7015.

Sincerely,

  
W. G. Hairston, III

Enclosures:

1. GPC's Response to NRC Request for Additional Information dated  
May 6, 1988.
2. Sample SED.

c: Georgia Power Company  
Mr. H. C. Nix, General Manager - Hatch  
Mr. L. T. Gucwa, Manager Licensing and Engineering - Hatch  
GO-NORMS

U.S. Nuclear Regulatory Commission, Washington, D.C.  
Mr. L. F. Crocker, Licensing Project Manager - Hatch

U.S. Nuclear Regulatory Commission, Region II  
Dr. J. N. Grace, Regional Administrator  
Mr. J. E. Menning, Senior Resident Inspector - Hatch

ENCLOSURE 1

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GPC's RESPONSE TO NRC DATED May 6, 1988

ENCLOSURE 1

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RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
DATED MAY 6, 1988

Generic Letter 83-28, Item 2.2.1 Program:

At Georgia Power Company's Plant Hatch, the determination of safety related and nonsafety related, as provided in the Equipment Location Index (ELI), is ultimately made by the architect engineers (AEs) (Southern Company Services and Bechtel) or the nuclear steam supply system (NSSS) vendor (General Electric).

The safety-related and nonsafety-related determination is made by using the following inputs.

- I. Quality Class "Q"\*
  - A. Function - Safety Related
    1. Licensing Considerations
      - a. FSAR
      - b. 10 CFR 50, Appendix A
      - c. Regulatory Guides
      - d. Generic Letters
      - e. Safety Evaluation Reports (SERs)
      - f. Other
    2. Design Considerations
      - a. Single Failure
      - b. Loss-of-Offsite Power (LOSP)
      - c. Hazards
      - d. Equipment Qualification
      - e. Design Basis Earthquake
      - f. ASME 1, 2, and 3
      - g. Mode of Operation
      - h. Quality Assurance Program
      - i. Other
    3. Safety Criteria
      - a. Maintain Reactor Coolant Pressure Boundary
      - b. Shut Down and Maintain Reactor Safety
      - c. Prevent or Mitigate Consequences of an Accident

\* - Quality Class "Q" and "Non-Q" are notations found in the ELI of which safety-related and nonsafety-related are subsets.

ENCLOSURE 1 (Continued)

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
DATED MAY 6 1988

- B. Function - Nonsafety Related
  - 1. Design Considerations
    - a. Utility Discretion
    - b. Quality Assurance Program (as applicable)
    - c. Anticipated Transient Without Scram (ATWS)
    - d. Fire Protection
    - e. ASME 3
    - f. Radwaste
    - g. Other
- II. Quality Class "Non-Q"\*
  - A. Function - Nonsafety Related
    - 1. Design Considerations
      - a. Seismic Class II/I
      - b. Other

Plant Hatch documents that control work are physically designated as safety related or nonsafety related. Examples are plant procedures, Maintenance Work Orders (MWOs), and procurement documents.

Plant procedures control work and are designated as safety related and nonsafety related. Procedures are designated nonsafety related by exception following a documented evaluation by the Nuclear Safety and Compliance Department.

MWOs are designated as safety related and nonsafety related. This designation is made by the Quality Control Organization by using the ELI and consulting with the Engineering Department, as required. The ELI is discussed further in the discussion of Item 2.2.1.1, Information Handling System.

Plant Hatch Procurement uses a procurement classification system. Within the classification system, the determination of safety related and nonsafety related is required. This determination has been made by the AE and previously recorded in plant design documents (i.e., specifications and design drawings). The Nuclear Procurement Review Group uses this determination to assign procurement levels as discussed in Item 2.2.1.5.

\* - Quality Class "Q" and "Non-Q" are notations found in the ELI of which safety-related and nonsafety-related are subsets.

ENCLOSURE 1 (Continued)

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
DATED MAY 6, 1988

Generic Letter 83-28, Item 2.2.1.1 Information Handling System

The Plant Hatch Information Handling System, which identifies plant components and their associated safety classifications, is the Equipment Location Index (ELI). The ELI is a computerized database that was developed and is maintained by the architect engineers (AEs). Unit 1 was developed by Southern Company Services and Unit 2 by Bechtel. The ELI database includes drawing numbers for P&IDs, elementaries, vendor manuals, and layout drawings. In addition, the ELI contains purchase order numbers, specification numbers, physical location, and quality designator for each plant component.

The maintenance of the ELI is controlled by plant procedures and supporting AE procedures. The update process is audited by Georgia Power Company Quality Assurance and AE Quality Assurance. Concerns relating to these audits are reported to upper management, and corrective action is identified.

In 1985, an ELI upgrade program was initiated in the form of System Evaluation Documents (SEDs) designed to provide functional safety classifications for plant equipment. These safety classifications are used to replace the simple "Q"/"Non-Q" designation provided in the original ELI. The safety-related classification is a subset of the "Q" designation.

SEDs for 56 safety systems have been completed by the AEs. Approximately 20 safety-related systems/SEDs remain to be completed. The SEDs are scheduled for completion by the end of 1989.

Generic Letter 83-28, Item 2.2.1.3 Use of Equipment Classification Listing

The Plant Hatch Equipment Classification Listing is the Equipment Location Index (ELI). The ELI is used by most plant and AE personnel as a reference document to provide easy access to drawings, specifications, purchase orders, and physical locations; however, some specific plant functions rely specifically on the ELI and the Safety Classification System. These functions are controlled by plant procedures.

Specifically, one use of the ELI is to designate Maintenance Work Orders (MWOs) as safety related or nonsafety related. This function is controlled by plant procedures and is performed by the Quality Control (QC) Organization. All MWOs are reviewed by the QC Department and designated as safety related or nonsafety related. Additional assistance is requested from Engineering, as required.

ENCLOSURE 1 (Continued)

RESPONSE TO NRC REQUEST FOR ADDITIONAL INFORMATION  
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Generic Letter 83-28, Item 2.2.1.5 Design Verification and Procurement

All Plant Hatch requisitions for safety-related parts and equipment are reviewed by a Nuclear Procurement Review Group (NPRG) to ensure appropriate descriptive technical and quality details are incorporated prior to further processing. The elements of this review include assignment of a procurement level, technical requirements including reference to design specifications or drawings, and specification of appropriate verification documentation and quality program references. Any special testing required by the design specification is identified in this review, including certification to a test report for environmentally qualified items. The decision to procure certain items commercial grade is also made during this review. Requirements for this review activity and the elements of the review are contained in the NPRG Nuclear Procurement Policy Manual and site procedures.

In many cases, the site NPRG identifies the required information by performing a document records search in the Document Control Records Management System. This system contains such information as: original design specification requirements, codes/standards, verification documentation, and test requirements. The Equipment Location Index is also used as a reference. Requirements for environmentally qualified equipment are contained on site in equipment qualification files.

The Quality Assurance audit of a supplier is an additional part of the verification process. Safety-related items are procured from qualified suppliers as determined by the results of triennial audits and annual evaluations. A list of qualified vendors is maintained and used by the NPRG and buying personnel.

ENCLOSURE 2

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SAMPLE SED